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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

BURAK OKSAYAN, JACK KESSLER,  
ANDREW ST. GEORGE, BRADFORD  
SCHLOSSER, ANDREW KARZ, and JAMI  
KANDEL, individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

MATCHGROUP, INC.

Defendant.

Case No.: 3:24-cv-00888-LB

Compl. Filed: February 14, 2024

Compl. Served: February 22, 2024

*Assigned to Hon. Laurel Beeler, United States  
Magistrate Judge*

**DECLARATION OF BAHAR SODAIFY IN  
SUPPORT OF JOINT STIPULATION TO  
MODIFY BRIEFING SCHEDULE**

[Stipulation and [Proposed] Order filed  
concurrently herewith]

Hearing Information:

Date: May 23, 2024

Time: 9:30 a.m.

Courtroom: B, 15th Floor

**DECLARATION OF BAHAR SODAIFY**

I, Bahar Sodaify, declare as follows:

1. I am a Partner at Clarkson Law Firm, P.C. (“Clarkson”) and counsel of record for Plaintiffs Burak Oksayan, Jack Kessler, Andrew St. George, Bradford Schlosser, Andrew Karz, and Jami Kandel (“Plaintiffs”) in this action. I am admitted to practice law in the State of California and before this Court. I have personal knowledge of the facts asserted in this declaration.

2. Pursuant to Civil Local Rule 6-2, Plaintiffs and MatchGroup, Inc., (“Defendant”) by and through their respective counsel of record, having met and conferred on April 22 and 23, 2024, stipulate that the current deadline for Plaintiffs to either respond by amendment or oppose Defendant’s Motion to Compel Arbitration and Dismiss or Stay Proceedings (“Motion”) is extended.

3. This modest extension is warranted as Plaintiffs’ counsel will be out of the country and will therefore require additional time to plan and prepare an adequate and thorough response to the Motion.

4. The only other extension or modification of time requested in this case was Defendant’s request for an extension of time to answer or otherwise respond to Plaintiffs’ Complaint, to which Plaintiffs stipulated and which the Court granted (ECF 8).

5. If Plaintiffs respond to the Motion by opposing it, their current response deadline would be April 29, 2024, and Defendant’s deadline to respond would be June 28, 2024.

6. If Plaintiffs respond to the Motion by amending their Complaint, Plaintiffs’ current response deadline would be May 6, 2024.

7. In the event Plaintiffs decide to amend their Complaint, the hearing on Defendants’ Motion will be vacated as moot.

8. The parties stipulate that the current case deadlines should be extended as follows: To and including June 10, 2024 for Plaintiffs’ amended complaint and July 22, 2024 for Defendant’s response, if Plaintiffs respond by amendment, and May 29, 2024 for Plaintiffs’ opposition and June 28, 2024 for Defendant’s reply, if Plaintiffs respond by opposing the Motion.

